



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

FILED

09-10-07
04:59 PM

Order Instituting Rulemaking to Promote Policy and
Program Coordination and Integration in Electric Utility
Resource Planning.

Rulemaking 04-04-003
(Filed April 1, 2004)

Order Instituting Rulemaking to Promote Consistency in
Methodology and Input Assumptions in Commission
Applications of Short-run and Long-run Avoided Costs,
Including Pricing for Qualifying Facilities.

Rulemaking 04-04-025
(Filed April 22, 2004)

**OPENING COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY ON THE
ALTERNATE PROPOSED DECISION OF COMMISSIONER GRUENEICH**

Georgetta J. Baker
Attorney for
San Diego Gas & Electric Company
101 Ash Street
San Diego, CA 92101
Tel: (619) 699-5064
Fax: (619) 699-5027
E-mail: gbaker@sempa.com

September 10, 2007

TABLE OF CONTENTS

	Page
I. INTRODUCTION	1
II. RECORD EVIDENCE DOES NOT SUPPORT USING LONG-TERM SP-15 FORWARD PRICES IN THE MARKET INDEX FORMULA	2
III. THE ALTERNATE INCORRECTLY CHARACTERIZES THE RECORD ON THE SP-15 DAY AHEAD MARKET	8
IV. THE ALTERNATE INCORRECTLY CHARACTERIZES THE ALL-IN PRICE OF THE FIRM CAPACITY OPTION	11
V. THE THIRD CONTRACT OPTION VIOLATES PURPA BY REQUIRING UTILITIES TO ACQUIRE POWER REGARDLESS OF NEED	11
VI. THE ALTERNATE INCORRECTLY CHARACTERIZES THE RECORD REGARDING THE NEED FOR LONG-TERM CONTRACTS FOR QFS IN THE SDG&E SERVICE AREA AND THE THIRD SO CONTRACT OPTION SHOULD BE MODIFIED FOR SDG&E CONSISTENT WITH RECORD EVIDENCE.....	12
VII. CONCLUSION.....	14
ATTACHMENT 1	A-1

TABLE OF AUTHORITIES

	Page
<u>CALIFORNIA PUBLIC UTILITIES COMMISSION DECISIONS</u>	
<i>D.96-10-036, Phase I Opinion, Application of San Diego & Electric Company (U 902-E) for an Ex Parte Order Approving Modifications to Uniform Standard Offer No. 1 and Standard Offer No. 3, October 9, 1996</i>	12
<i>D.02-10-062, Interim Opinion, Order Instituting Rulemaking to Establish Policies and Cost Recovery Mechanisms for Generation Procurement and Renewable Resource Development, October 24, 2002</i>	9
<i>D.02-12-074, Interim Opinion, Order Instituting Rulemaking to Establish Policies and Cost Recovery Mechanisms for Generation Procurement and Renewable Resource Development, December 19, 2002</i>	9
<i>D.07-09-017, Interim Opinion on Reporting and Verification of Greenhouse Gas Emissions in the Electricity Sector, September 7, 2007</i>	9
<u>FEDERAL ENERGY REGULATORY COMMISSION DECISIONS</u>	
<i>City of Ketchikan, Alaska, et al, March 15, 2001, EL01-26-000, 94 FERC ¶61,293</i>	12
<i>City of Ketchikan, Alaska, et al, reh'g denied, May 14, 2001, EL01-26-000, 95 FERC ¶61,194</i>	12
<i>Notice of Proposed Rulemaking, New PURPA Section 210(m) Regulations Applicable to Small Power Production and Cogeneration Facilities, January 19, 2006, RM06-10-000, 114 FERC ¶61,043</i>	12
<i>Order Regarding Future Monitoring of Voluntary Price Formation, Use of Price Indices in Jurisdictional Tariffs, and Closing Certain Tariff Dockets, November 19, 2004, PL03-3-005, 109 FERC ¶61,184</i>	4
<u>RULES OF PRACTICE AND PROCEDURE</u>	
Article 14	1
<u>JOURNALS</u>	
Platts, Megawatt Daily, July 23, 2007	3

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Promote Policy and Program Coordination and Integration in Electric Utility Resource Planning.

Rulemaking 04-04-003
(Filed April 1, 2004)

Order Instituting Rulemaking to Promote Consistency in Methodology and Input Assumptions in Commission Applications of Short-run and Long-run Avoided Costs, Including Pricing for Qualifying Facilities.

Rulemaking 04-04-025
(Filed April 22, 2004)

**OPENING COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY ON THE
ALTERNATE PROPOSED DECISION OF COMMISSIONER GRUENEICH**

I. INTRODUCTION

Pursuant to Article 14 of the California Public Utilities Commission's ("CPUC" or "Commission") Rules of Practice and Procedure, San Diego Gas & Electric Company ("SDG&E") files these Comments on the Alternate Proposed Decision of Commissioner Grueneich ("Alternate" or "APD"), mailed August 20, 2007. In addition, because these Comments focus on the use of forward prices in the Market Index Formula ("MIF"), these Comments are equally applicable to the Revised ("Rev.1") Proposed Decision of ALJ Halligan ("Revised Proposed Decision" or "RPD"), mailed July 26, 2007.¹

In contrast to the Proposed Decision of ALJ Halligan ("Proposed Decision" or "PD"), which SDG&E supported,² the RPD and Alternate reflect legal and factual error warranting rejection or significant modification.

¹ Due to the timing of the mailing of the RPD, parties were precluded from filing comments on it.

² SDG&E filed opening and reply comments supporting the PD, subject to limited modification/clarification, on May 25 and June 4, respectively.

The MIFs reflected in both the RPD and the Alternate rely on data that substantial record evidence demonstrates to be deficient or for which no record evidence has been adduced. Both the RPD and the Alternate rely on data that is neither robust nor transparent and both use an *unknown* average of 24-month SP-15/NP-15 forward market data without any collars to protect against unexpected volatility.

The Alternate incorrectly characterizes the record in key respects, including the SP-15 day-ahead market, and adopts a long-term contract price that is inconsistent with the record. Further, the Alternate adopts a Standard Offer (“SO”) contract option for new Qualifying Facilities (“QFs”) (sized 25 MW or less, consuming at least 25 percent of their power internally and selling the surplus power to utilities). SDG&E requests that this SO option be modified to comply with the Public Utility Regulatory Policies Act of 1978 (“PURPA”),³ and related precedent, and to reflect record evidence relative to QF participation in SDG&E’s requests for proposals (“RFO”).

Accordingly, SDG&E respectfully requests the Commission to correct the legal and factual errors discussed herein prior to issuance of either the RPD or the Alternate.

II. RECORD EVIDENCE DOES NOT SUPPORT USING LONG-TERM SP-15 FORWARD PRICES IN THE MARKET INDEX FORMULA

At page 65 of the Alternate, the discussion of the use of forward prices acknowledges SDG&E’s concerns that the data are not sufficiently liquid and robust but fails to adopt a methodology that adequately addresses those concerns. To provide an appropriate gauge to determine utility avoided costs, the RPD and/or APD must be revised so that the utilities are not forced to rely on thin, illiquid, and suspect data.

³ 16 U.S.C. §824a-3 and 18 C.F.R. §§292.301 *et seq.*

Unlike the data proposed by SDG&E that relied on market indexes for electricity and gas that were shown to have sufficient liquidity using measures of liquidity established by the Federal Energy Regulatory Commission (“FERC”),⁴ the MIFs that both the APD and RPD adopt rely on unknown and untested data for electricity market prices to calculate the Incremental Energy Rate (“IER”). The only party in the proceeding to propose to use long-term forward market electric prices was the California Cogeneration Council (“CCC”). CCC’s witness Beach stated upon cross examination that he relied on a single broker quote beyond the period covered by NYMEX data.⁵ Mr. Beach further acknowledged that he did not know how much market information the broker quote was based on.⁶

The RPD and the APD both suggest using Platts *Megawatt Daily* and/or the Intercontinental Exchange (“ICE”) as sources for 24 month forward prices. However, neither ICE nor *Megawatt Daily* publishes 24 individual months of forward prices, and the data *Megawatt Daily* does publish is based on an unknown number of transactions. Platts *Megawatt Daily* provides the following disclaimer, “Platts makes no warranties, express or implied, as to the accuracy, adequacy or completeness of the data and other information set forth in this publication (“data”) or as to the merchantability or fitness for a particular use with respect to the data.”⁷ NYMEX currently only publishes five months of forward market data for SP-15 based on their assessment of the liquidity of the forward markets.⁸ There is no transparent forward market data available for 24 individual months, and no analysis is provided in either the APD or RPD to

⁴ Exhibit 85, page 9 and Exhibit 86, pp. DTB-20-DTB-22.

⁵ SDG&E Opening Brief, p. 35. It should also be noted that NYMEX data for SP-15 now only covers five months in the future. Data available at <https://www.services.nymex.com/otcsettlement/OTCSettle.aspx>.

⁶ SDG&E Opening Brief, p. 35.

⁷ Platts *Megawatt Daily*, July 23, 2007, p. 2.

⁸ NYMEX SP-15 data available at <https://www.services.nymex.com/otcsettlement/OTCSettle.aspx>.

show the degree of liquidity of the market for any of the 24 forward months. CCC commented appropriately in Phase 1 of this proceeding regarding the use of forward prices, “The Commission should not allow the prices for a small number of transactions to drive prices paid to a substantial share of California’s current and future generation.”⁹

Neither the RPD nor the APD should dismiss SDG&E’s concerns about the lack of liquidity and transparency in the MIF because lack of liquidity and transparency invites market manipulation. As the Alternate states on page 63, “[a]s we have learned from the 2000 Energy Crisis, the potential ability to manipulate market prices is harmful to ratepayers and the overall energy market.” Notwithstanding such recognition, the APD and RPD then proceed to force the utilities to rely on data that has not been shown to satisfy the standards for market liquidity that the FERC has established.¹⁰ The Alternate should not be permitted to establish a procedure that could conflict with federal law.

The other SDG&E concern regarding the use of long-term forward market prices is their volatility. The IER used in the short-run avoided cost (“SRAC”) energy price formula has been fixed now for over 10 years. Introducing the use of a 24-month long-term electric and gas forward prices could potentially introduce a tremendous amount of volatility into the calculation of SRAC energy prices. The CCC data on forward prices for 2006 showed a variation of over 20 percent within a span of 8 months in 2005.¹¹ And recently, there has been a sharp rise in forward electric prices, showing forward markets continue to be volatile. As the CCC witness acknowledged, “when you start looking at forward market prices, the first thing you realize is

⁹ SDG&E Opening Brief, p. 36.

¹⁰ *Order Regarding Future Monitoring of Voluntary Price Formation, Use of Price Indices in Jurisdictional Tariffs, and Closing Certain Tariff Dockets*, 109 FERC ¶61,184 (2004).

¹¹ SDG&E Opening Brief, p. 36.

that they are heavily influenced by what's happening on that day.”¹² Further he acknowledged long-term forward prices are overly sensitive to shocks.¹³ This increased level of volatility, first introduced by the RPD and APD, creates additional risk for ratepayers and unnecessary complication to the price risk management process implemented by SDG&E on behalf of its customers.¹⁴

The RPD and APD both rely on a flawed analysis to suggest the volatility of forward prices is low, stating “We note that by using a 24-month rolling average of forward prices, there is little, if any, difference between a collared and an uncollared heat rate.” However, the analysis as shown in Table 3 appears to take a single 24 month forward gas and electric price quote and compares each of the months to one another. SDG&E would not expect much variation of annual averages within a single long-term forward price quote from a single day unless there was a market shock of some sort in the near term. What would be volatile is the annual average forward prices from one trading month to the next. As indicated above, CCC’s data showed significant variation in forward prices from one month to the next over the 8 trading days analyzed.

Both the RPD and the APD also do not clearly define how many 24 month forward price quotes are to be averaged. A *rolling* average implies that each month, one component of the average is replaced by a newer data element. A *24 month rolling average* would presumably have one month of the 24 months worth of 24 month forward prices replaced with the most recent month. For example, August 2007 would be based on a number of trading days of 24

¹² Tr. at 3941, line 28-3942, line 2.

¹³ Opening Brief, p. 36.

¹⁴ This is implemented through the Customer Risk Tolerance (“CRT”) process. Using a potentially highly volatile rolling average for the IER will cause a revaluation as the IER changes. This will result in a significantly increased uncertainty when attempting to report and manage changes to CRT on an ongoing basis.

month forward prices from August, 2005 through July, 2007. For September 2007, the forward price quotes from August, 2005 would be removed from the average and would be replaced with August, 2007 data, the latest data available. On the other hand, a 12 month moving average, as shown in one column on Table 3, would indicate August 2007 would be based on a number of trading days of 24 month forward prices from August, 2006 through July, 2007. For September 2007, the forward price quotes from August, 2006 would be removed from the average and would be replaced with August, 2007 data, the latest available. Whether 24 months or 12 months is to be used in the rolling average is further confused by the statement on page 66 that the MIF is based on Southern California Edison Company's ("SCE") proposed methodology, which suggests a 12 month rolling average. Obviously, the longer the averaging period, the less volatility will exist in the calculated IER. Both the RPD and the APD should clarify the number of months of data to be averaged.

A proper analysis of volatility of the IER would have calculated a 12 month or 24 month rolling average of 24 month forward price quotes. Instead, the analysis in Table 3 of the RPD and APD appears to use a single long-term forward market price quote for 24 months. Looking at a single price quote for a single day from an unknown source is insufficient to determine the rolling average of 24 month forward market prices will be sufficiently stable to not require a collar. The faulty analysis, not derived from the record, cannot support the RPD and APD claims that the "rolling average of forward prices serves to mitigate excessive price volatility."¹⁵

Given these problems with the use of long-term forward prices and the clearly inadequate record for the proposed use of long-term forward market prices in both the RPD and the APD,

¹⁵ APD, p. 66.

the Revised Proposed Decision and the Alternate should be revised to use a rolling average of historical day-ahead NP 15/SP 15 market prices in the PD to calculate the IER.

As SDG&E showed, an IER developed from recent history of day ahead electric and bidweek gas prices provided similar values to forward markets for 2006,¹⁶ but without having to rely on data of suspect quality and potentially subject to manipulation and without adding additional and potentially substantial volatility to the SRAC pricing formula. Similarly, the record evidence summarized in SCE's opening brief showed that CAC/EPUC calculation of the IER based on near-term forward market prices and production cost model simulations were not much different than the IER based on historical data.¹⁷ An IER developed from recent history of day ahead electric and bidweek gas prices can reduce the potential volatility associated with the use of long-term forward prices without changing IER calculation substantially.

Alternatively, if long-term forward prices are used, the IER for an entire calendar year could be set based on a three month average of forward prices for that year, presuming 15 months of long-term forward prices were available and robust. Under this proposal, the IER for calendar year 2008 would be based on a three month look-back of the average forward market electric and gas prices for calendar year 2008 based on single trading day each week from October 2007 through late December 2007. As an example, in December 2007, SDG&E would look at the forward prices for each month/quarter of 2008 that were quoted on the second business day of each week of the month for the months of October, November and the first three weeks of December. The forward prices for calendar year 2008 from each of the trading days would be averaged to arrive at a single IER for year 2008 and this IER would remain in effect for all of 2008. The process would again be repeated in December of 2008 for setting the IER for

¹⁶ Opening Brief, p. 37.

¹⁷ SCE Opening Brief, table on page 35.

2009, unless the Commission revises the SRAC formula as a result of implementation of Market Redesign and Technology Update (“MRTU”). A three month average of annual forward price quotes and setting the IER constant for each calendar year will reduce the volatility associated with long-term forward price quotes.

III. THE ALTERNATE INCORRECTLY CHARACTERIZES THE RECORD ON THE SP-15 DAY AHEAD MARKET

The Alternate’s characterization of the record on the SP-15 day ahead market is unsubstantiated and based on nothing more than speculative assumptions advanced by QF parties. The Alternate, therefore, should be revised to eliminate the language at page 61 that the day ahead markets “are easily manipulated” and the corresponding “new” discussion on pages 62 and 63. These statements are unfounded assertions by QF parties that were never substantiated on the record. If adopted, these assertions could have the unintended consequence of being used to thwart the Alternate's proposals to use SP-15 prices in the MIF and to adjust the MIF in the future to incorporate MRTU day ahead market prices.

More particularly, the SP-15 day ahead market was shown to be highly liquid for both on-peak and off-peak products.¹⁸ And all parties agreed that the reported price indices are valid, providing a reasonable representation of arm’s length transactions.¹⁹

Additionally, the issue of underscheduling was discussed extensively in the proceeding and no evidence was produced to show utilities underscheduled. The QF parties’ witnesses admitted that since 2003, when the utilities resumed procurement, historical scheduling was in the range of expected accuracy in predicting load.²⁰ Further, since the adoption of the ISO Tariff

¹⁸ APD, p. 55; Ex. 1, page 54; Ex.86, pp. DTB- 20-22. This contention is also supported in the CAISO’s Annual Report, Ex. 48, p. 2-13.

¹⁹ Tr. Vol. 23 at 3321:25- 3323:15

²⁰ Tr. Vol. 22 at 3209:14-19.

Amendment 72, there has been a pattern of overscheduling rather than underscheduling.²¹ In addition, the California Independent System Operator Corporation (“CAISO”) Department of Market Analysis never found that the utilities were underscheduling the day-ahead needs to drive down day ahead market prices.²²

Moreover, the claim that utilities were scheduling undeliverable power and that that practice had an impact on prices was not supported by the evidence. The deliverability problems were related to new power plants coming on line in SP-15.²³ Even with these new power plants and associated deliverability problems, wholesale energy prices in SP-15 were not significantly different than NP-15 which had no deliverability problems.²⁴

Similarly, QF allegations of “strategic generation and dispatch” would require that utilities violate Commission rules regarding least cost dispatch as adopted in D.02-10-062 and D.02-12-074. It additionally assumes that the CPUC, FERC, and the CAISO’s Department of Market Analysis and Department of Market Surveillance all fail in their oversight functions.

And while the Alternate indicates the MIF could be changed once the CAISO’s MRTU day ahead energy market is in place, the Alternate as written will provide QF parties with the same set of arguments regarding the MRTU day ahead market. Since the CAISO will be operating a real-time market as well as the day ahead market, the same unsupported assertions regarding underscheduling, infeasible schedules and strategic generation and dispatch can still be made with reference to the MRTU day ahead market.

²¹ Tr. Vol. 22 at 3214:8-3215:3.

²² Ex. 54, p. 8.

²³ Tr. Vol. 23 at 3339-3341.

²⁴ Tr. Vol. 22 at 3292 and Ex. 28, pp. 3-17.

Likewise, the reference at page 61 of the Alternate of the SP-15 market being less than 5 percent of the total power purchases by the utility may also be true in the future regarding utility purchases from the MRTU day ahead market. Given the Commission's recent decision on greenhouse gas ("GHG") reporting protocols,²⁵ it may be the case that most power acquired will be via bilateral contract in order not to be assigned the default GHG emissions value assigned to the MRTU market purchases. However, as the record showed, it is not the amount of purchases from the market that is important, it is whether the particular market price plays a role in marginal electricity purchases and sales and in determining dispatch decisions.²⁶ The essence of avoided cost pricing is that payments to the QF should reflect the payments that would have been made to the sources of power that were displaced by the QF.

Lastly, SDG&E disagrees with the Alternate regarding both paying a high price for the firm capacity the QF provides and adjusting the energy price upward for the RMR and must offer obligations; however, that issue has been the focus of much discussion in the proceeding and SDG&E will not repeat it here.²⁷ Instead, SDG&E here requests that the Alternate be revised to avoid setting an impossible standard for the MRTU day ahead market to meet in the future. Specifically, SDG&E requests the Alternate be modified to expressly state that CAISO purchases to provide ancillary services will not invalidate the MRTU day ahead market from being a measure of the utilities avoided costs as it relates to QF purchases.²⁸

²⁵ D.07-09-017.

²⁶ Ex. 86, p. DTB-19-DTB-20.

²⁷ SDG&E Opening Brief, pp. 41-43; 48-51; SDG&E Reply Brief, pp. 8-9.

²⁸ See SCE Opening Brief, pp. 31-32.

IV. THE ALTERNATE INCORRECTLY CHARACTERIZES THE ALL-IN PRICE OF THE FIRM CAPACITY OPTION

The Alternate states at page 96, “Although capacity prices and heat rates vary, the all-in power prices under the CAC/EPUC and IEP proposals are essentially the same as the adopted value.” Review of Table 7, however, clearly shows that this is not the case. The value of 8.3 cents per kWh is clearly substantially larger than the CAC/EPUC and IEP values of 7.4 and 7.3 cent per kWh, respectively. In addition, the 8.3 cents/kWh applies to SCE; based on the IER for SDG&E in the Alternate, the price is 8.43 cents/kWh, clearly well above the values proposed by CAC/EPUC and IEP.

The fact that the Alternate adopts an all-in price higher than any party proposed in the proceeding shows it to be in error. The Alternate should be revised to be based on the record in this proceeding. The capacity and energy payments should be based on the values proposed by CAC/EPUC or IEP. With the proposed pricing structure, the prices paid will exceed the cost of a new CCGT and exceed the MPR. No cogeneration resources will bid into SDG&E’s RFOs as long as the proposed long-term contract provides an expected all-in price that exceeds the MPR.

V. THE THIRD CONTRACT OPTION VIOLATES PURPA BY REQUIRING UTILITIES TO ACQUIRE POWER REGARDLESS OF NEED

The Alternate proposes to establish a third SO contract option for new QFs expected to produce 25 MW (164,250 MWh) or less who consume at least 25 percent of their power internally and sell all surplus power to the utility Conclusion of Law (“COL”) 18 clarifies the Alternate’s intent that under this third SO contract option, utilities would be obligated to take power from the new QFs, potentially under long-term contracts, regardless of utility need. This requirement clearly violates PURPA and related FERC precedent and is clearly inexplicable

given the Alternate's extensive discussion of PURPA requirements.²⁹ Therefore, the Alternate, including COL 18, must be modified to expressly provide that this third SO contract option does not require the utility to enter into long-term contracts with the new QF³⁰ to purchase power that is not needed to meet system requirements.³¹

VI. THE ALTERNATE INCORRECTLY CHARACTERIZES THE RECORD REGARDING THE NEED FOR LONG-TERM CONTRACTS FOR QFS IN THE SDG&E SERVICE AREA AND THE THIRD SO CONTRACT OPTION SHOULD BE MODIFIED FOR SDG&E CONSISTENT WITH RECORD EVIDENCE

The Alternate states at page 120, that it is adopting this third SO contract option "because a small QF is unable to bid into a utility RFO, generally does not have the resources or expertise required to negotiate and enter into a bilateral contract with the utility, and is prohibited by current rules from selling surplus generation directly to the CAISO." As demonstrated below, those assertions do not apply to SDG&E.

First, as noted at page 92 of the Alternate, it is generators under 1 MW that do not have access to CAISO markets. Generators over 1 MW can sell their surplus generation into California energy markets. Second, there was no evidence presented in the proceeding that QFs

²⁹ See, e.g., discussion in Alternate at 115-124.

³⁰ D.96-10-036, 68 CPUC2d 434, 1996 Cal PUC LEXIS 1016 at *33 ("Taking a look at the statute, we find no mandated minimum term for PURPA required purchases. Looking to FERC regulations, we similarly find no mandated minimum term.")

³¹ See *City of Ketchikan, Alaska, et al. ("Ketchikan")* (2001) 94 FERC ¶61,293, *reh'g denied*, 95 FERC ¶61,194 (2001), where the FERC stated at 62,062, "[A] qualifying facility may seek to have a utility purchase more energy or capacity than the utility requires to meet its total system load. In such a case, while the utility is legally obligated to purchase any energy or capacity provided by a qualifying facility, the purchase rate should only include payment for energy or capacity which the utility can use to meet its total system load" and "while utilities may have an obligation under PURPA to purchase from a QF, that obligation does not require a utility to pay for capacity that it does not needs." (citing *Connecticut Light and Power Company* (1995) 70 FERC ¶61,012, reconsideration denied, 71 FERC ¶61,035 (1995), appeal dismissed, *Niagra Mohawk Power Corporation v. FERC* (D. C. Cir. 1997) 117 F.3d 1485 "CP&L"). See also FERC Docket No. RM06-10-006, Notice of Proposed Rulemaking, *Regulations Applicable to Small Power Production and Cogeneration Facilities*, 71 FR 4532 at 4533 ([T]here is no obligation under PURPA for a utility to pay for capacity that would displace its existing capacity arrangements." *Ketchikan*, 94 FERC ¶62,062, citing *CP&L*.

smaller than 25 MW³² could not participate in SDG&E RFOs. On the contrary, four (4) QFs with a total nameplate capacity of 22 MW have successfully participated in SDG&E's RFOs.³³ Of all the QF witnesses cross examined on this point, not one was aware of any instance in which QFs were unable to participate in SDG&E's RFOs.³⁴ As far as bilateral contracts, SDG&E has three bilateral contracts totaling 32 MWs of nameplate capacity with no indication by any QF witness that QFs were unable to obtain bilateral contracts with SDG&E.

Given that there is no record evidence of a problem for SDG&E, this SO contract option should be limited to QFs smaller than 5 MW (or 32,850 MWh) who consume at least 25 percent of their power internally and sell all surplus power to the utility. This level will cover all QFs who may have trouble with direct access to California markets. This level is also fair to SDG&E customers because the SO contracts would have much larger potential economic consequences for SDG&E customers given SDG&E's relatively small size compared to Pacific Gas and Electric Company and SCE. Because SDG&E's procurement customers would have to bear the above-market cost³⁵ of the power; they should not have to bear a disproportionate share of above-market costs.

³² The alternate adopts the 164,250 MWh standard based on a 25 MW plant with a 75 percent capacity factor.

³³ SDG&E Opening Brief, pp. 22-23.

³⁴ SDG&E Opening Brief, p. 23.

³⁵ Excess power will be sold into the SP-15 market. Because the APD adopts a MIF that is above the SP-15 market price, the power would be above the SP-15 market price and would be sold at a loss in the SP-15 with SDG&E procurement customers paying for the losses incurred.

VII. CONCLUSION

For the foregoing reasons, SDG&E respectfully requests the Commission to revise the RPD or the Alternate, whichever is adopted, to correct the legal and factual errors consistent with the discussion herein.

Respectfully submitted,

/s/ GEORGETTA J. BAKER

Georgetta J. Baker

Attorney for

San Diego Gas & Electric Company

101 Ash Street

San Diego, CA 92101

Tel: (619) 699-5064

Fax: (619) 699-5027

E-mail: gbaker@sempra.com

September 10, 2007

Attachment 1

ATTACHMENT 1

Pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure, SDG&E proposes the following changes to the Alternate Proposed Decision's Findings of Fact and Conclusions of Law.

Proposed Revisions to Findings of Fact:

~~19. Through their role as scheduling coordinators, the utilities could influence the market clearing price at the NP15/SP15 trading points.~~

23. It is reasonable to use ~~forward, rather than~~ historical prices to develop the market heat rate component of the Market Index Formula. A Market Index Formula with an IER based on an average of ~~forward-historical~~ NP 15/SP 15 market prices and the existing Commission adopted heat rates reasonably reflects the utilities' short-run avoided cost. SCE's method of calculating an average of day ahead NP 15/SP 15 market prices is reasonable.

24. It is reasonable to use ~~forward, rather than~~ historical prices to develop the market heat rate component of the Market Index Formula

Or, if the Commission determines that long-term forward prices out to 15 months are available and robust, then FOFs 23 and 24 should be revised as follows:

23. A Market Index Formula with an IER based on an average of forward NP 15/SP 15 market prices and the existing Commission adopted heat rates reasonably reflects the utilities' short-run avoided cost.

24. It is reasonable to use forward, rather than historical prices to develop the market heat rate component of the Market Index Formula. The IER for a calendar year should be based on a three month look-back of the average forward market electric and gas prices for following calendar year. A three month average of annual forward price quotes and setting the IER constant for each calendar year will reduce the volatility associated with long-term forward price quotes.

40. ~~Small-QFs under 1 MW~~ cannot bid into utility RFOs or sell surplus power directly to the CAISO.

41. It is reasonable to allow new QFs under 25 MW that consume at least 25% of the power internally and sell 100% of the surplus to the utility to obtain an as-

available standard contract; except that for SDG&E, the applicable limitation for new QFs shall be under 5 MW.

43. It is reasonable to state the 25 MW limitation as an annual GWh limitation of 164,250 MWh (25 MW X 8760 X 0.75); except that for SDG&E, the 5 MW limitation should be stated as an annual GWh limitation of 32,850 MWh (5 MW X 8760 X 0.75).

Proposed Revision to Conclusion of Law:

18. Potential over-subscription due to new QF contracts ~~that are not covered by the small QF contract option~~ should be evaluated, first, through an IOU's long-term procurement plan.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **OPENING COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY ON THE ALTERNATE PROPOSED DECISION OF COMMISSIONER GRUENEICH** on all parties identified in R.04-04-003 and R.04-04-025 on the attached service list by U.S. mail and electronic mail, and by Federal Express to the assigned Commissioner(s) and Administrative Law Judge(s).

Dated at San Diego, California, this 10th day of September, 2007.

/s/ JOEL DELLOSA

Joel Dellosa

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

Proceeding: R0404003 - CPUC - PG&E, EDISON,

Filer: CPUC - PG&E, EDISON, SDG&E

List Name: LISTQFISSUES

Last changed: August 30, 2007

anogee@ucsusa.org	ALAN	NOGEE
roger@berlinerlawpllc.com	ROGER	BERLINER
lisa.decker@constellation.com	LISA M.	DECKER
jimross@r-c-s-inc.com	JAMES	ROSS
toms@i-cpg.com	TOM	SKUPNJAK
pseby@mckennalong.com	PAUL M.	SEBY
todil@mckennalong.com	TIMOTHY R.	ODIL
maureen@lennonassociates.com	MAUREEN	LENNON
douglass@energyattorney.com	DANIEL W.	DOUGLASS
berj.parseghian@sce.com	BERJ K.	PARSEGHIAN
woodrujb@sce.com	JAMES	WOODRUFF
janet.combs@sce.com	JANET	COMBS
michael.backstrom@sce.com	MICHAEL A.	BACKSTROM
daking@sempra.com	DANIEL A.	KING
gbaker@sempra.com	GEORGETTA J.	BAKER
cneedham@edisonmission.com	CRYSTAL	NEEDHAM
phil@reesechambers.com	W. PHILLIP	REESE
mflorio@turn.org	MICHEL PETER	FLORIO
cwl@cpuc.ca.gov	Cleveland	Lee
kpp@cpuc.ca.gov	Karen P.	Paull
map@cpuc.ca.gov	Marion	Peleo
dwang@nrdc.org	DEVRA	WANG
ek@a-klaw.com	EVELYN	KAHL
evk1@pge.com	EDWARD V.	KURZ
magq@pge.com	MARY A.	GANDESBERY
saw0@pge.com	SHIRLEY	WOO
agrimaldi@mckennalong.com	ANN G.	GRIMALDI
kbowen@winston.com	KAREN	BOWEN
jkarp@winston.com	JOSEPH M.	KARP
jeffgray@dwt.com	JEFFREY P.	GRAY
alhj@pge.com	ARTHUR L.	HAUBENSTOCK
ssmyers@att.net	SARA STECK	MYERS
purves@grsllc.net	ALAN	PURVES
rick_noger@praxair.com	RICK	NOGER
wbooth@booth-law.com	WILLIAM H.	BOOTH
hoerner@redefiningprogress.org	ANDREW	HOERNER
elarsen@rcmdigesters.com	ERIC	LARSEN
gmorris@emf.net	GREGG	MORRIS
jgalloway@ucsusa.org	JOHN	GALLOWAY
nrader@calwea.org	NANCY	RADER

tomb@crossborderenergy.com	TOM	BEACH
pcmcdonnell@earthlink.net	PATRICK	MCDONNELL
wem@igc.org	BARBARA	GEORGE
michaelboyd@sbcglobal.net	MICHAEL E.	BOYD
joyw@mid.org	JOY A.	WARREN
brbarkovich@earthlink.net	BARBARA R.	BARKOVICH
bill@jbsenergy.com.	WILLIAM B.	MARCUS
hydro@davis.com	RICHARD D.	ELY
grosenblum@caiso.com	GRANT A.	ROSENBLUM
sford@caiso.com	STACIE	FORD
abb@eslawfirm.com	ANDREW B.	BROWN
dkk@eslawfirm.com	DOUGLAS K.	KERNER
atrowbridge@daycartermurphy.com	ANN L.	TROWBRIDGE
mpa@a-klaw.com	MICHAEL	ALCANTAR
carlo.zorzoli@enel.it	CARLO	ZORZOLI
dgulino@ridgewoodpower.com	DANIEL V.	GULINO
bshort@ridgewoodpower.com	WILLIAM P.	SHORT
sesco@optonline.net	RICHARD M.	ESTEVES
csmoots@perkinscoie.com	CAROL A.	SMOOTS
jbwilliams@mwe.com	JOSEPH B.	WILLIAMS
myuffee@mwe.com	MICHAEL A.	YUFFEE
	ANAN H.	SOKKER
rshapiro@chadbourn.com	ROBERT	SHAPIRO
	TANDY	MCMANNES
ralph.dennis@constellation.com	RALPH E.	DENNIS
dmcfarlan@mwgen.com	DOUGLAS	MCFARLAN
brianhaney@useconsulting.com	BRIAN	HANEY
david.saul@solel.com	DAVID	SAUL
chilen@sppc.com	CHRISTOPHER	HILEN
rprince@semprautilities.com	RASHA	PRINCE
hchoy@isd.co.la.ca.us	HOWARD W.	CHOY
dhuard@manatt.com	DAVID L.	HUARD
pucservice@manatt.com	RANDALL W.	KEEN
curtis.kebler@gs.com	CURTIS	KEBLER
sam@climateregistry.org	SAM	HITZ
mgibbs@icfconsulting.com	MICHAEL J.	GIBBS
Case.Admin@sce.com	CASE	ADMINISTRATION
j.eric.isken@sce.com	ERIC J.	ISKEN
gary.allen@sce.com	GARY L.	ALLEN
laura.genao@sce.com	LAURA	GENAO
lizbeth.mcdannel@sce.com	LIZBETH	MCDANNEL
tory.weber@sce.com	TORY S.	WEBER
jyamagata@semprautilities.com	JOY C.	YAMAGATA
dwood8@cox.net	DON	WOOD
tim.hemig@nrgenergy.com	TIM	HEMIG
kmelville@sempra.com	KEITH W.	MELVILLE
gbass@semprasolutions.com	GREG	BASS
liddell@energyattorney.com	DONALD C.	LIDDELL, P.C.
scottanders@sandiego.edu	SCOTT J.	ANDERS
bpowers@powersengineering.com	WILLIAM E.	POWERS

centralfiles@semprautilities.com	CENTRAL	FILES
cmanzuk@semprautilities.com	CHUCK	MANZUK
irene.stillings@energycenter.org	IRENE M.	STILLINGS
jkloberdanz@semprautilities.com	JOSEPH	KLOBERDANZ
dpapapostolou@semprautilities.com	DESPINA	PAPAPOSTOLOU
jleslie@luce.com	JOHN W.	LESLIE
lkostrzewa@edisonmission.com	LAWRENCE	KOSTRZEWA
pherrington@edisonmission.com	PHILIP	HERRINGTON
jmcarthur@elkhills.com	JIM	MARTHUR
bjl@bry.com	BARRY	LOVELL
pepper@cleanpowermarkets.com	JANIS C.	PEPPER
chris@emeter.com	CHRIS	KING
mdjoseph@adamsbroadwell.com	MARC D.	JOSEPH
slefton@aptecheng.com	STEVEN A.	LEFTON
diane_fellman@fpl.com	DIANE I.	FELLMAN
freedman@turn.org	MATTHEW	FREEDMAN
nao@cpuc.ca.gov	Noel	Obiora
filings@a-klaw.com	KAREN	TERRANOVA
nes@a-klaw.com	NORA	SHERIFF
rsa@a-klaw.com	ROD	AOKI
dickerson06@fscgroup.com	CHRIS ANN	DICKERSON, PHD
ell5@pge.com	ED	LUCHA
mekd@pge.com	MARC	KOLB
mrh2@pge.com	MARK R.	HUFFMAN
taj8@pge.com	TOM	JARMAN
cem@newsdata.com		
bcragg@goodinmacbride.com	BRIAN T.	CRAGG
jscancarelli@flk.com	JANINE L.	SCANCARELLI
koconnor@winston.com	KARLEEN	O'CONNOR
lcottle@winston.com	LISA A.	COTTLE
ldolqueist@steefel.com	LORI ANNE	DOLQUEIST
ren@ethree.com	REN	ORENS
bobgex@dwt.com	ROBERT B.	GEX
stevegreenwald@dwt.com	STEVEN F.	GREENWALD
CRMd@pge.com	CHARLES R.	MIDDLEKAUFF
cpuccases@pge.com	LAW DEPARTMENT	FILE ROOM
mdbk@pge.com	MARGARET D.	BROWN
ecrem@ix.netcom.com	EDWARD C.	REMEDIOS
l_brown369@yahoo.com	LYNNE	BROWN
mecsoft@pacbell.net	MAURICE	CAMPBELL
gxl2@pge.com	GRACE	LIVINGSTON-NUNLEY
karp@pge.com	KATHERINE	RYZHAYA
nbb2@pge.com	NINA	BUBNOVA
vjw3@pge.com	VALERIE J.	WINN
k.abreu@sbcglobal.net	KENNETH E.	ABREU
mark_j_smith@fpl.com	MARK J.	SMITH
beth@beth411.com	BETH	VAUGHAN
mhharrer@sbcglobal.net	MARK	HARRER
andy.vanhorn@vhcenergy.com	ANDREW J.	VAN HORN
alexm@calpine.com	ALEXANDRE B.	MAKLER

kowalewskia@calpine.com	AVIS	KOWALEWSKI
duggank@calpine.com	KEVIN	DUGGAN
sbeserra@sbcglobal.net	SARAH	BESERRA
phanschen@mofo.com	PETER W.	HANSCHEN
editorial@californiaenergycircuit.net	J.A.	SAVAGE
mrw@mrwassoc.com		
mrw@mrwassoc.com	DAVID	HOWARTH
mrw@mrwassoc.com	WILLIAM A.	MONSEN
rschmidt@bartlellwells.com	REED V.	SCHMIDT
janice@strategenconsulting.com	JANICE	LIN
chrism@mid.org	CHRISTOPHER J.	MAYER
sarveybob@aol.com	ROBERT	SARVEY
gabrielilaw@sbcglobal.net	JOHN C.	GABRIELLI
rmccann@umich.edu	RICHARD	MCCANN
puma@davis.com	SHAWN	SMALLWOOD, PH.D.
demorse@omsoft.com	DAVID	MORSE
brian.theaker@williams.com	BRIAN	THEAKER
davidreynolds@ncpa.com	DAVID	REYNOLDS
steveng@destrategies.com	STEVEN A.	GREENBERG
dougdpucmail@yahoo.com	DOUG	DAVIE
dcarroll@downeybrand.com	DAN L.	CARROLL
etiedemann@kmtg.com	EDWARD J	TIEDEMANN
kdw@woodruff-expert-services.com	KEVIN	WOODRUFF
steven@iepa.com	STEVEN	KELLY
www@eslawfirm.com	WILLIAM W.	WESTERFIELD III
vwood@smud.org	VIKKI	WOOD
rlauckhart@henwoodenergy.com	RICHARD	LAUCKHART
jesus.arredondo@nrgenergy.com	E. JESUS	ARREDONDO
karen@klindh.com	KAREN	LINDH
pholley@covantaenergy.com	PATRICK	HOLLEY
rfp@eesconsulting.com	ANNE	FALCON
dws@r-c-s-inc.com	DONALD	SCHOENBECK
ppl@cpuc.ca.gov	Peter	Lai
ayk@cpuc.ca.gov	Amy C.	Yip-Kikugawa
cab@cpuc.ca.gov	Carol A.	Brown
chh@cpuc.ca.gov	Charlyn A.	Hook
djh@cpuc.ca.gov	Donna J.	Hines
joh@cpuc.ca.gov	Jerry	Oh
jmh@cpuc.ca.gov	Julie	Halligan
mjd@cpuc.ca.gov	Matthew	Deal
mts@cpuc.ca.gov	Merideth	Sterkel
mkh@cpuc.ca.gov	Mikhail	Haramati
gig@cpuc.ca.gov	Robert	Kinosian
rls@cpuc.ca.gov	Robert L.	Strauss
skh@cpuc.ca.gov	Sepideh	Khosrowjah
car@cpuc.ca.gov	Steve	Linsey
skg@cpuc.ca.gov	Sudheer	Gokhale
tdp@cpuc.ca.gov	Terrie D.	Prosper
tcx@cpuc.ca.gov	Theresa	Cho
tcr@cpuc.ca.gov	Thomas	Roberts

tbo@cpuc.ca.gov
snuller@ethree.com
bmeister@energy.state.ca.us
dks@cpuc.ca.gov
kris.chisholm@eob.ca.gov
mjaske@energy.state.ca.us
wsm@cpuc.ca.gov

mmiller@energy.state.ca.us
rwethera@energy.state.ca.us

Traci
SNULLER
BRADLEY
Don
KRIS G.
MICHAEL
Wade
IRYNA
MARY ANN
RON

Bone
PRICE
MEISTER
Schultz
CHISHOLM
JASKE
McCartney
KWASNY
MILLER
WETHERALL

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

Proceeding: R0404025 - PUC - OIR TO PROMOTE

Filer: CPUC

List Name: LISTQFISSUES

Last changed: August 30, 2007

anogee@ucsusa.org	ALAN	NOGEE
roger@berlinerlawpllc.com	ROGER	BERLINER
lisa.decker@constellation.com	LISA M.	DECKER
jimross@r-c-s-inc.com	JAMES	ROSS
toms@i-cpg.com	TOM	SKUPNJAK
pseby@mckennalong.com	PAUL M.	SEBY
todil@mckennalong.com	TIMOTHY R.	ODIL
maureen@lennonassociates.com	MAUREEN	LENNON
douglass@energyattorney.com	DANIEL W.	DOUGLASS
berj.parseghian@sce.com	BERJ K.	PARSEGHIAN
woodrujb@sce.com	JAMES	WOODRUFF
janet.combs@sce.com	JANET	COMBS
michael.backstrom@sce.com	MICHAEL A.	BACKSTROM
daking@sempra.com	DANIEL A.	KING
gbaker@sempra.com	GEORGETTA J.	BAKER
cneedham@edisonmission.com	CRYSTAL	NEEDHAM
phil@reesechambers.com	W. PHILLIP	REESE
mflorio@turn.org	MICHEL PETER	FLORIO
cwl@cpuc.ca.gov	Cleveland	Lee
kpp@cpuc.ca.gov	Karen P.	Paull
map@cpuc.ca.gov	Marion	Peleo
dwang@nrdc.org	DEVRA	WANG
ek@a-klaw.com	EVELYN	KAHL
evk1@pge.com	EDWARD V.	KURZ
magq@pge.com	MARY A.	GANDESBERY
saw0@pge.com	SHIRLEY	WOO
agrimaldi@mckennalong.com	ANN G.	GRIMALDI
kbowen@winston.com	KAREN	BOWEN
jkarp@winston.com	JOSEPH M.	KARP
jeffgray@dwt.com	JEFFREY P.	GRAY
alhj@pge.com	ARTHUR L.	HAUBENSTOCK
ssmyers@att.net	SARA STECK	MYERS
purves@grsllc.net	ALAN	PURVES
rick_noger@praxair.com	RICK	NOGER
wbooth@booth-law.com	WILLIAM H.	BOOTH
hoerner@redefiningprogress.org	ANDREW	HOERNER
elarsen@rcmdigesters.com	ERIC	LARSEN
gmorris@emf.net	GREGG	MORRIS
jgalloway@ucsusa.org	JOHN	GALLOWAY

nrader@calwea.org
tomb@crossborderenergy.com
pcmcdonnell@earthlink.net
wem@igc.org
michaelboyd@sbcglobal.net
joyw@mid.org
brbarkovich@earthlink.net
bill@jbsenergy.com.
hydro@davis.com
grosenblum@caiso.com
sford@caiso.com
abb@eslawfirm.com
dkk@eslawfirm.com
atrowbridge@daycartermurphy.com
mpa@a-klaw.com
carlo.zorzoli@enel.it
dgulino@ridgewoodpower.com
bshort@ridgewoodpower.com
sesco@optonline.net
csmoots@perkinscoie.com
jbwilliams@mwe.com
myuffee@mwe.com

rshapiro@chadbourne.com

ralph.dennis@constellation.com
dmcfarlan@mwgen.com
brianhaney@useconsulting.com
david.saul@solel.com
chilen@sppc.com
rprince@semprautilities.com
hchoy@isd.co.la.ca.us
dhuard@manatt.com
pucservice@manatt.com
curtis.kebler@gs.com
sam@climateregistry.org
mgibbs@icfconsulting.com
Case.Admin@sce.com
j.eric.isken@sce.com
gary.allen@sce.com
laura.genao@sce.com
lizbeth.mcdannel@sce.com
tory.weber@sce.com
jyamagata@semprautilities.com
dwood8@cox.net
tim.hemig@nrgenergy.com
kmelville@sempra.com
gbass@semprasolutions.com
liddell@energyattorney.com
scottanders@sandiego.edu

NANCY
TOM
PATRICK
BARBARA
MICHAEL E.
JOY A.
BARBARA R.
WILLIAM B.
RICHARD D.
GRANT A.
STACIE
ANDREW B.
DOUGLAS K.
ANN L.
MICHAEL
CARLO
DANIEL V.
WILLIAM P.
RICHARD M.
CAROL A.
JOSEPH B.
MICHAEL A.
ANAN H.
ROBERT
TANDY
RALPH E.
DOUGLAS
BRIAN
DAVID
CHRISTOPHER
RASHA
HOWARD W.
DAVID L.
RANDALL W.
CURTIS
SAM
MICHAEL J.
CASE
ERIC J.
GARY L.
LAURA
LIZBETH
TORY S.
JOY C.
DON
TIM
KEITH W.
GREG
DONALD C.
SCOTT J.

RADER
BEACH
MCDONNELL
GEORGE
BOYD
WARREN
BARKOVICH
MARCUS
ELY
ROSENBLUM
FORD
BROWN
KERNER
TROWBRIDGE
ALCANTAR
ZORZOLI
GULINO
SHORT
ESTEVEZ
SMOOTS
WILLIAMS
YUFFEE
SOKKER
SHAPIRO
MCMANNES
DENNIS
MCFARLAN
HANEY
SAUL
HILEN
PRINCE
CHOY
HUARD
KEEN
KEBLER
HITZ
GIBBS
ADMINISTRATION
ISKEN
ALLEN
GENAO
MCDANNEL
WEBER
YAMAGATA
WOOD
HEMIG
MELVILLE
BASS
LIDDELL, P.C.
ANDERS

bpowers@powersengineering.com
centralfiles@semprautilities.com
cmanzuk@semprautilities.com
irene.stillings@energycenter.org
jkloberdanz@semprautilities.com
dpapapostolou@semprautilities.com
jleslie@luce.com
lkostrzewa@edisonmission.com
pherrington@edisonmission.com
jmcarthur@elkhills.com
bjl@bry.com
pepper@cleanpowermarkets.com
chris@emeter.com
mdjoseph@adamsbroadwell.com
sleifton@aptecheng.com
diane_fellman@fpl.com
freedman@turn.org
nao@cpuc.ca.gov
filings@a-klaw.com
nes@a-klaw.com
rsa@a-klaw.com
dickerson06@fscgroup.com
ell5@pge.com
mekd@pge.com
mrh2@pge.com
taj8@pge.com
cem@newsdata.com
bcragg@goodinmacbride.com
jscancarelli@flk.com
koconnor@winston.com
lcottle@winston.com
ldolqueist@steefel.com
ren@ethree.com
bobgex@dwt.com
stevegreenwald@dwt.com
CRMd@pge.com
cpuccases@pge.com
mdbk@pge.com
ecrem@ix.netcom.com
l_brown369@yahoo.com
mecsoft@pacbell.net
gxl2@pge.com
karp@pge.com
nbb2@pge.com
vjw3@pge.com
k.abreu@sbcglobal.net
mark_j_smith@fpl.com
beth@beth411.com
mhharrer@sbcglobal.net
andy.vanhorn@vhcenergy.com

WILLIAM E.
CENTRAL
CHUCK
IRENE M.
JOSEPH
DESPINA
JOHN W.
LAWRENCE
PHILIP
JIM
BARRY
JANIS C.
CHRIS
MARC D.
STEVEN A.
DIANE I.
MATTHEW
Noel
KAREN
NORA
ROD
CHRIS ANN
ED
MARC
MARK R.
TOM

BRIAN T.
JANINE L.
KARLEEN
LISA A.
LORI ANNE
REN
ROBERT B.
STEVEN F.
CHARLES R.
LAW DEPARTMENT
MARGARET D.
EDWARD C.
LYNNE
MAURICE
GRACE
KATHERINE
NINA
VALERIE J.
KENNETH E.
MARK J.
BETH
MARK
ANDREW J.

POWERS
FILES
MANZUK
STILLINGS
KLOBERDANZ
PAPAPOSTOLOU
LESLIE
KOSTRZEWA
HERRINGTON
MCARTHUR
LOVELL
PEPPER
KING
JOSEPH
LEFTON
FELLMAN
FREEDMAN
Obiora
TERRANOVA
SHERIFF
AOKI
DICKERSON, PHD
LUCHA
KOLB
HUFFMAN
JARMAN

CRAGG
SCANCARELLI
O'CONNOR
COTTLE
DOLQUEIST
ORENS
GEX
GREENWALD
MIDDLEKAUFF
FILE ROOM
BROWN
REMEDIOS
BROWN
CAMPBELL
LIVINGSTON-NUNLEY
RYZHAYA
BUBNOVA
WINN
ABREU
SMITH
VAUGHAN
HARRER
VAN HORN

alexm@calpine.com
kowalewskia@calpine.com
duggank@calpine.com
sbeserra@sbcglobal.net
phanschen@mofo.com
editorial@californiaenergycircuit.net
mrw@mrwassoc.com
mrw@mrwassoc.com
mrw@mrwassoc.com
rschmidt@bartlells.com
janice@strategenconsulting.com
chrism@mid.org
sarveybob@aol.com
gabriellilaw@sbcglobal.net
rmccann@umich.edu
puma@davis.com
demorse@omsoft.com
brian.theaker@williams.com
davidreynolds@ncpa.com
steveng@destategies.com
dougdpucmail@yahoo.com
dcarroll@downeybrand.com
etiedemann@kmtg.com
kdw@woodruff-expert-services.com
steven@iepa.com
www@eslawfirm.com
vwood@smud.org
rlauckhart@henwoodenergy.com
jesus.arredondo@nrgenergy.com
karen@klindh.com
pholley@covantaenergy.com
rfp@eesconsulting.com
dws@r-c-s-inc.com
ppl@cpuc.ca.gov
ayk@cpuc.ca.gov
cab@cpuc.ca.gov
chh@cpuc.ca.gov
djh@cpuc.ca.gov
joh@cpuc.ca.gov
jmh@cpuc.ca.gov
mjd@cpuc.ca.gov
mts@cpuc.ca.gov
mkh@cpuc.ca.gov
gig@cpuc.ca.gov
rls@cpuc.ca.gov
skh@cpuc.ca.gov
car@cpuc.ca.gov
skg@cpuc.ca.gov
tdp@cpuc.ca.gov
tcx@cpuc.ca.gov

ALEXANDRE B.
AVIS
KEVIN
SARAH
PETER W.
J.A.

DAVID
WILLIAM A.
REED V.
JANICE
CHRISTOPHER J.
ROBERT
JOHN C.
RICHARD
SHAWN
DAVID
BRIAN
DAVID
STEVEN A.
DOUG
DAN L.
EDWARD J
KEVIN
STEVEN
WILLIAM W.
VIKKI
RICHARD
E. JESUS
KAREN
PATRICK
ANNE
DONALD
Peter
Amy C.
Carol A.
Charlyn A.
Donna J.
Jerry
Julie
Matthew
Merideth
Mikhail
Robert
Robert L.
Sepideh
Steve
Sudheer
Terrie D.
Theresa

MAKLER
KOWALEWSKI
DUGGAN
BESERRA
HANSCHEN
SAVAGE

HOWARTH
MONSEN
SCHMIDT
LIN
MAYER
SARVEY
GABRIELLI
MCCANN
SMALLWOOD, PH.D.
MORSE
THEAKER
REYNOLDS
GREENBERG
DAVIE
CARROLL
TIEDEMANN
WOODRUFF
KELLY
WESTERFIELD III
WOOD
LAUCKHART
ARREDONDO
LINDH
HOLLEY
FALCON
SCHOENBECK
Lai
Yip-Kikugawa
Brown
Hook
Hines
Oh
Halligan
Deal
Sterkel
Haramati
Kinosian
Strauss
Khosrowjah
Linsey
Gokhale
Prosper
Cho

tcr@cpuc.ca.gov
tbo@cpuc.ca.gov
snuller@ethree.com
bmeister@energy.state.ca.us
dks@cpuc.ca.gov
kris.chisholm@eob.ca.gov
mjaske@energy.state.ca.us
wsm@cpuc.ca.gov

mmiller@energy.state.ca.us
rwethera@energy.state.ca.us

Thomas
Traci
SNULLER
BRADLEY
Don
KRIS G.
MICHAEL
Wade
IRYNA
MARY ANN
RON

Roberts
Bone
PRICE
MEISTER
Schultz
CHISHOLM
JASKE
McCartney
KWASNY
MILLER
WETHERALL